

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PROJECT VERITAS and PROJECT  
VERITAS ACTION FUND,

Plaintiffs/Counterclaim-Defendants,

v.

JAMES O'KEEFE and TRANSPARENCY  
1, LLC d/b/a O'KEEFE MEDIA GROUP,

Defendants/Counterclaim-Plaintiffs.

Civil Action No. 7:23-cv-04533

**COUNTERCLAIM PLAINTIFFS O'KEEFE AND OMG'S NOTICE OF  
MOTION FOR LEAVE TO FILE AMENDED COUNTERCLAIMS**

Counterclaim-Plaintiffs, JAMES O'KEEFE and TRANSPARENCY 1, LLC d/b/a O'KEEFE MEDIA GROUP, hereby submit this notice of filing a motion to this Court pursuant to Fed. R. Civ. P. 15(a)(2) and 16(b)(4) and Local Rules 7.1(a) and 15.1 for an order authorizing leave to amend their Counterclaims [ECF No. 73] against Counterclaim-Defendants, Project Veritas and Project Veritas Action Fund. The proposed Amended Counterclaim is attached hereto with amendments appearing in redline at **Exhibit A** and in final form at **Exhibit B**.

Dated: June 18, 2025.



**CHILDERS LAW, LLC**

2135 NW 40th Terrace, Suite B  
Gainesville, Florida 32605  
tel. 866-996-6104 fax 407-209-3870

/s/ Nicholas P. Whitney

Nicholas P. Whitney  
Florida Bar No. 119450  
Seldon J. Childers  
Florida Bar No. 61112  
jchilders@smartbizlaw.com  
nwhitney@smartbizlaw.com  
notice@smartbizlaw.com  
*Counsel for Defendants and Counterclaim-  
Plaintiffs O'Keefe & OMG*

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing document (including any attached exhibits and documents) electronically with the Clerk of the Court using CM/ECF on June 18, 2025, which served same electronically upon all counsel of record.

/s/ Nicholas P. Whitney  
Attorney